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April 28, 2025

## VIA ECF

The Honorable Jed S. Rakoff United States District Judge, Southern District of New York Daniel Patrick Moynihan Courthouse 500 Pearl Street New York, NY 10007-1312

Re: Philip von Kahle ex rel. Coex Coffee International, Inc. v. Cargill, Inc., No. 1:21-cv-08532 (JSR)(SDA) (S.D.N.Y.)

Dear Judge Rakoff:

On behalf of the parties, pursuant to Rule 6.1 of the Southern District of New York's Electronic Case Filing Rules & Instructions, and Rule 14(c) of this Court's Individual Rules of Practice, Plaintiff Philip von Kahle, in his capacity as assignee for the benefit of creditors of Coex Coffee International, Inc. ("Plaintiff"), hereby submits this joint motion for sealing of documents.

During a telephone conference with the Court earlier today, Defendant Cargill, Inc. ("Cargill") requested that Plaintiff be required to file certain documents supporting his forthcoming motion *in limine* under seal for a limited period. The Court orally ordered that the documents may be filed under seal and shall remain under seal for three days. The Court further directed that the parties meet and confer to discuss whether and to what extent those documents shall remain sealed.

The parties are filing this letter motion in accordance with Rule 6.1 of the S.D.N.Y ECF Rules, which require a public filing on the docket in order to electronically file a document under seal.

50 aRVERED 0305 4-23-75 April 28, 2025 Page 2

Counsel for Plaintiff has conferred with counsel for Cargill, which has consented to the filing of this joint letter motion.

Respectfully submitted,

## /s/ Jason P. Hernandez

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Attorneys for Plaintiff Philip Von Kahle, in his capacity as Assignee for the benefit of Creditors of Coex Coffee International, Inc.

## /s/ Joshua S. Levy

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